IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

LUENY MORELL, WALDEMAR RAMÍREZ and the conjugal partnership composed by them

PLAINTIFFS

٧.

HP Corp.; HP LABS; LAUREL KRIEGER, et al,

DEFENDANTS

WALDEMAR CIVIL NO: 14-1123 (PAD)

AGE DISCRIMINATION; RETALIATION; DAMAGES

JURY TRIAL DEMANDED

JOINT MOTION FOR VOLUNTARY DISMISSAL WITH PREJUDICE

TO THE HONORABLE COURT:

COME NOW the parties, through their respective attorneys of record and respectfully **STATE** and **PRAY**:

- 1. The parties reached a private and confidential settlement agreement in this case.
- 2. In light of the confidential settlement agreement, plaintiffs request the voluntary dismissal of the complaint with prejudice without the imposition of attorney's fees or cost to any party.
- 3. The parties also request to order the parties to maintain confidential the terms and conditions of the settlement agreement.

WHEREFORE, it is respectfully requested that the Honorable Court take notice of this motion, grant the voluntary dismissal with prejudice of the

complaint and order that the written agreement between the parties remain confidential.

RESPECTFULLY SUBMITTED, on this the 25th day of April, 2016.

s/ Michelle Pirallo-Di Cristina MICHELLE PIRALLO-DI CRISTINA USDC-PR-214903 Attorney for Plaintiffs

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